

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION

DORMAN ANGEL, et al. : Case No. 1:01-CV-467  
(BECKWITH, JUDGE)

Plaintiffs :

vs. : MOTION OF DEFENDANT PACE LOCAL 5-1967  
TO RESET CALENDAR

PACE LOCAL 5-1967, and :  
PAPER, ALLIED INDUSTRIAL,  
CHEMICAL & ENERGY WORKERS  
INTERNATIONAL UNION, :  
AFL-CIO, and

INTERNATIONAL PAPER COMPANY  
and :

SMART PAPER, LLC :

Defendants

Defendant PACE Local 5-1967 moves to reset calendar for pretrial to a date later than May 25, 2005, and trial to a date later than June 13, 2005. The following memorandum states why.

The original calendar dates of April 29, 2005 for pretrial and May 16, 2005 for trial were available to the undersigned counsel for defendant PACE Local 5-1967. When the Court granted Plaintiffs' motion to extend discovery cutoff from December 31, 2004 to January 31, 2005, with extensions granted, the dates of pretrial and trial were correspondingly moved back to May 25, 2005, and June 13, 2005.

The undersigned has been notified that meetings are scheduled the week of June 13, 2005, at Chateau La Mer II in Destin, Florida, to survey Hurricane Ivan damage and repairs pending. As Vice President of this condo association his participation in these

meetings and examinations of repair of damage completed and pending is necessary. For any trial date later than the week of June 13, 2005, the undersigned will be available for trial.

/s/Robert I. Doggett  
Robert I. Doggett (0016849)  
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CERTIFICATE OF SERVICE

The undersigned certifies that he served copies of the above document by the Clerk's CM/ECF system upon counsel for all parties.

/Robert\_I.\_Doggett  
Robert I. Doggett (0016849)  
Trial Attorney for PACE Local 5-1967